UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 0 1 2005

VIA FACSIMILE (312) 917-1572 AND U.S. MAIL

REPLY TO THE ATTENTION OF: SE-5J

Mr. John Latoza
The Rise Group
120 South LaSalle, Suite 1750
Chicago, Illinois 60603

RE: Transmittal Memo dated May 23, 2005 (Project No 02.0226.00) 160 East Illinois, Chicago, Illinois

Dear Mr. Latoza:

U.S. EPA has reviewed the above-referenced memo and attachments. Our requested changes are as follows:

Memorandum Re: Scope of Work for Soil Survey

Page 1, second paragraph, first sentence ends with: "...resulted in residual contamination from thorium, a radioactive element." This should be revised as "...resulted in residual contamination from thorium, a radioactive element, and the tailings and wastes produced by the extraction and concentration of thorium."

Page 1, second paragraph, last sentence, "The subject property has no history of either use by Lindsay Light or evidence of radiological impacts." However, the interior survey by the U.S. Environmental Protection Agency showed two areas of thorium contamination. Because these were small and not likely to lead to substantial endangerment, the owners were not directed to remove these prior to building demolition. This text should read, as does the first full sentence on page 2, "Those areas were determined by USEPA to be indicative of thorium contamination, but because of the size of the contamination and associated risk, it was deemed acceptable to continue building demolition."

Summary of Radiological Survey and Monitoring Conducted at 160 East Illinois Street Chicago, Illinois

None of the four comments stated in the May 12, 2005, transmittal memo under "Summary of Radiological..." are covered in this revised memorandum.

The comment directed to Appendix B in the May 12, 2005 transmittal memo was not covered in this revised memorandum. The appropriate cleanup criterion ("action level") for the Streeterville area is 7.1 pCi/g, not 7.2 pCi/g as stated in the revised document.

Existing Conditions

There is no count rate criterion in this section that indicates what level would be considered contaminated.

Option A. Foundation Wall Removal and Survey

There is no criterion in this section that indicates what level would be considered contaminated for soils. The Streeterville cleanup criteria of 7.1 pCi/g should be stated and used.

Option B. Trench and Survey Exterior Side of Foundation Wall

*There is no criterion in this section that indicates what level would be considered contaminated for soils. The Streeterville cleanup criteria of 7.1 pCi/g for soils should be stated and used.

More information needs to be provided about the temporary holding of Supersacks. This, in part, needs to be where they will be stored, under what surveillance, with what periodic monitoring, with what time limit, etc. Supersacks should be transferred for offsite disposal as soon as possible to prevent accidents and inadvertent spreading of contamination.

It was agreed remaining radioactive material must also be identified in some way, such as with plastic sheeting, plywood, etc. It would also be very helpful to have the contact exposure rate in micro-Roentgen per hour in order to allow judgments on potential dose or risk.

Excavate and Survey Proposed Utility Corridors

This section should include information as requested in the comments for Option B above.

Remove Sidewalks and Alley Pavement and Survey

This section should include information as requested in the comments for Option B above.

Appendix B

Footnotes: The cleanup criterion is 7.1 pCi/g. The count rate should be compared to this number.

7.2 pCi/g is not appropriate for downhole logging since this is a different geometry from surface measurements.

If you have any questions regarding this correspondence, please contact me at (312) 886-3601, Larry Jensen at (312) 886-5026, or Eugene Jablonowski at (312) 886-4591.

Sincerely,

E Jablonowski for Verneta Simon

Verneta Simon
On-Scene Coordinator

cc: Richard Berggreen, GeoSyntec Consultnts

bcc: Mary Fulghum, C-14J
Charles Gebien, SE-5J
Eugene Jablonowski,SR-6J
Larry Jensen, SMF-4J
Cathy Martwick, C-14J